

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

DEAN FOX

Plaintiff,

v.

**REPRESENTATIVE JEREMY FAISON,
State Representative, representing the 11th
District of Tennessee House of
Representatives, in his official capacity,**

Defendant.

No. 3:22-cv-00691

District Judge Aleta A. Trauger

JOINT MOTION TO AMEND CASE MANAGEMENT ORDER

Pursuant to Rules 6(b) and 40 of the Federal Rules of Civil Procedure, as well as Local Rules 6.01 and 16.01, Plaintiff Dean Fox and Defendant Jeremy Faison, by and through their attorneys of record, hereby move the Court to amend the case management order (Doc. 40) as follows:

Deadline	Current	Proposed
Discovery (written and depositions)	March 29, 2024	September 27, 2024
Dispositive Motions	September 15, 2024	October 23, 2024
Responses to Dispositive Motions	October 6, 2024	November 13, 2024
Replies	October 13, 2024	November 20, 2024

In the Initial Case Management Order, the Court recognized that “[d]iscovery may be reopened or extended subject to the Supreme Court’s decision in *Lindke v. Freed*, U.S., No. 22-611.” Doc. 40, at 3. Counsel for the parties conferred and agreed that an extension of time to complete discovery and file dispositive motions is necessary. These later deadlines will permit time for additional discovery requests and party depositions after the Supreme Court’s decisions in *Lindke v. Freed*, U.S., No. 22-611. Accordingly, the parties respectfully move the Court to

enter a modified scheduling order that reflects these deadlines.

Dated: April 1, 2024

Respectfully submitted,

/s/ Jennifer Safstrom
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Counsel for Representative Jeremy Faison

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was electronically filed on April 1, 2024, and served via the Court's CM/ECF system upon the following:

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